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EX PARTE OR LATE FILED

February 27, 2002

RECEIVED

FEB 27 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

<u>Ex Parte Submission</u>

Mr. William Caton
Federal Communications Commission
Room TW-B-204
445 12th Street, S.W.
Washington, D.C. 20554

 Re: Joint Application by BellSouth Corporation, et al, for Provision of In-
   Region, InterLATA Services in Georgia and Louisiana, CC Docket No.
   <u>02-35</u>

Dear Mr. Caton:

 In response to a request from the Georgia Public Service Commission, on
February 25, 2002, BellSouth made a filing that included affidavits of William Stacy and
Ken Ainsworth in GPSC Docket 6863-U. Those affidavits and their exhibits address
BellSouth's successful implementation of telephone number ("TN") migration and a
parsed CSR, as well as BellSouth's line-loss reporting and its progress toward
implementation of a "single C" order process. At the request of the Common Carrier
Bureau Staff, BellSouth is providing the Commission with a complete copy of this filing
including the affidavits and exhibits. Please note that the address-related errors and
reject and clarification data included in Exhibit 6 to the recent Stacy Affidavit filed with
the GPSC differ very slightly from the information included in Exhibit SVA-64 to the
Stacy/Varner/Ainsworth Affidavit filed with this Commission on February 14, 2002. As
explained in Exhibit 6, that is because BellSouth has corrected two small errors in the
prior data.

 Some of the information contained in BellSouth's GPSC filing is confidential.
Accordingly, pursuant to the Commission's rules governing confidential
communications, I am enclosing one original copy of this letter with the confidential
material. Inquiries regarding access to confidential material submitted with this letter
should be addressed to Laura Brennan, Kellogg, Huber, Hansen, Todd & Evans, PLLC,
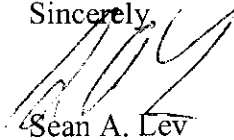1615 M Street, N.W., Suite 400, Washington, D.C. 20036, (202) 367-7821.

Redacted for Public Inspection

Mr. William Caton
February 27, 2002
Page 2

       In accord with the Commission's rules governing ex parte communications, I am enclosing two copies of this letter redacted for public inspection. Please file-stamp and return the additional copy.

Sincerely,

Sean A. Lev

Attachments

cc: Renee Crittendon
        Susan Pie
        Cynthia Lewis
        James Davis-Smith
        Leon Bowles
        Arnold Chauviere
        Qualex

Redacted for Public Inspection

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

RECEIVED

FEB 27 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Joint Application by BellSouth Corporation,)
BellSouth Telecommunications, Inc.,) CC Docket No. 02-35
and BellSouth Long Distance, Inc. for)
Provision of In-Region, InterLATA)
Services in Georgia and Louisiana)

JOINT APPLICATION BY BELLSOUTH
FOR PROVISION OF IN-REGION, INTERLATA SERVICES
IN GEORGIA AND LOUISIANA

BELLSOUTH EX PARTE

FEBRUARY 27, 2002

BellSouth Telecommunications, Inc.
Legal Department
1025 Lenox Park Boulevard
Suite 6C01
Atlanta, GA 30319-5309

bennett.ross@bellsouth.com

Bennett L. Ross
General Counsel - Georgia

404 986 1718
Fax 404 986 1800

February 25, 2002

DELIVERED BY HAND

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

      Re: *BellSouth Telecommunications, Inc.'s Entry into InterLATA Services Pursuant to Section 271 of the Telecommunications Act of 1996;* Docket No. 6863-U

Dear Mr. McAlister:

Enclosed please find the original and eighteen (18) copies, as well as an electronic version, of Affidavits of William N. Stacy and Ken L. Ainsworth on behalf of BellSouth Telecommunications, Inc. in response to the Commission's letter dated February 18, 2002. I would appreciate your filing same and returning three (3) extra copies stamped "filed" in the enclosed self-addressed and stamped envelopes.

Thank you for your assistance in this matter.

Very truly yours,

Bennett L. Ross   (*gmc*)

BLR:nvd
Enclosures

cc: Mr. Leon Bowles
     Mr. Ken Ellison
     Parties of Record (via electronic mail)

135416

BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

In Re:)
)
BellSouth Telecommunications, Inc.'s Entry into) Docket No. 6863-U
InterLATA Services Pursuant to Section 271 of)
the Telecommunications Act of 1996)

BELLSOUTH TELECOMMUNICATIONS, INC.'S
STATEMENT OF CONFIDENTIALITY

BellSouth Telecommunications, Inc. ("BellSouth") hereby files this Statement of

Confidentiality pursuant to Section 515-3-1.11 of the Rules of the Georgia Public Service

Commission ("PSC"), and states as follows:

1.   Rule 515-3-1.11 requires that a party claiming that information constitutes a trade

secret provide, in writing, the basis of this claim. Rule 515-3-1.11(c) specifically

requires that this statement detail (1) the economic benefit derived from the

information not being generally known; (2) the economic benefit to others if

disclosure were to occur; and (3) the procedures utilized to maintain

confidentiality. This statement is submitted to meet these requirements. The

confidential trade secret information appears in the Affidavit and Exhibits of

William N. Stacy filed on behalf of BellSouth in the above-referenced docket.

2.   The subject trade secret material is comprised of customer specific data and

vendor specific information that BellSouth is obligated to protect. The customer

specific information contained therein pertains to the end user service volumes of

various competing local exchange carriers ("CLECs") and data for CLECs' end

users. Disclosure of such information would provide CLECs competing with

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each other valuable market information relating to each company's customers and the manner each intends to offer service to their customers.

3. In the current emerging competitive market for local services, disclosure of this information to competitors will allow CLECs an unfair competitive advantage.

4. Also included in the trade secret material is vendor specific information. BellSouth is contractually obligated to maintain the confidentiality of the vendor's name with respect to third parties.

5. The trade secret information BellSouth seeks to protect is not generally known, and this information is not readily ascertainable to third parties by any proper means. BellSouth takes all appropriate and legal measures to ensure that such information is disseminated internally only to those with a need to know, and that all public measures are taken to protect the information when it is required to be filed in a public forum.

6. BellSouth has provided this confidential information to the Commission under protective seal as part of an application labeled "Trade Secret." BellSouth also is providing the Commission with a public version of the material, designated "Public Disclosure Document," which does not include the confidential information.

Dated this 25th day of February 2002.

BELLSOUTH TELECOMMUNICATIONS, INC.

Bennett L. Ross

BENNETT L. ROSS
General Counsel – Georgia
1025 Lenox Park Boulevard
Suite 6C01
Atlanta, Georgia 30319-5309
(404) 986-1718

2

Before the
GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of	)	
	)	
Application by BellSouth Corporation,	)	Docket No. 6863-U
BellSouth Telecommunications, Inc.,	)	
and BellSouth Long Distance, Inc., for	)	
Provision of In-Region, InterLATA	)	
Services in Georgia	)	

AFFIDAVIT OF WILLIAM N. STACY

I, William N. Stacy, being of lawful age and duly sworn upon my oath, hereby depose

and state:

I. INTRODUCTION

1. My name is William N. Stacy, I am employed by BellSouth Telecommunications,

   Inc. ("BellSouth") as the Network Vice President-Interconnection Services.

2. The purpose of this affidavit is to provide information responsive to the issues

   addressed in the request of the Georgia Public Service Commission ("GPSC")

   dated February 18, 2002.

Public Disclosure Document

Public Disclosure Document

II. MIGRATION BY TELEPHONE NUMBER

3. "Telephone Number" or "TN" migration is a functionality that significantly reduces the information that a CLEC must include on an LSR for UNE-P[1], and consequently the likelihood that errors will lead to the rejection of the LSR.

4. In its October 19, 2001 Order in Docket No. 8663-U, the GPSC ordered BellSouth to "implement by November 3, 2001, migration by Telephone Number and name." On November 3, 2001, BellSouth implemented Release 10.2. As part of this Release, BellSouth removed the edits that had required the End User Service Address field to be populated on valid activity types for the UNE-P (Req Type M). As a result of this modification, a CLEC seeking to migrate a retail customer to UNE-P needs only populate the name and Telephone Number fields on LSR, and BellSouth's systems will validate the customer's telephone number as it appears on the LSR. It is BellSouth's understanding that this is the same manner in which other incumbents handle UNE-P migration.

5. As part of its testing of Release 10.2 during the 30 day period between the Commission's order and the implementation date, BellSouth determined that LSRs would process correctly using this new functionality when BellSouth's Regional Street Address Guide (RSAG) associated only one address with the telephone number appearing on the LSSR. Based on a review of actual requests, BellSouth estimated that approximately 70% of LSRs would fall into this category. When there were two or more addresses associated with the telephone number in RSAG, which BellSouth estimated would occur with approximately 30% of LSRs, the

---

[1] On February 2, 2002 BellSouth expanded the CLECs' ability to order by telephone numbering to include resale (non-complex plus, ISDN-BRI, and PBX) and loops (excluding DSL).

associated LSR would be rejected or auto clarified back to the CLEC with a request

for a valid address. In a Carrier Notification Letter issued on November 2, 2001,

BellSouth advised CLECs of the implementation of this enhanced functionality to

facilitate UNE-P migrations, but also noted the problems that might be encountered

in a UNE-P migration when an LSR was submitted with a Name and Telephone

Number and there were one or more non-working addresses associated with that

telephone number. BellSouth encouraged CLECs to continue to populate the End

User Service Address field on the LSR until this situation was remedied. BellSouth

explained that it would implement a fix, no later than November 17, 2001, that

would allow the processing of LSRs when a working address as well as one or more

non-working addresses were reflected in RSAG.

6.   BellSouth and the CLECs, via the CCP, held a meeting on November 16, 2001, to

discuss the results of BellSouth's internal testing results and WorldCom's testing

results for the release correcting the problem identified with Release 10.2. Attached

as Exhibit WNS-1 are the minutes from that meeting. During that meeting,

WorldCom indicated that it would be submitting requests on November 17, 2001,

after the release to ensure that no problems were experienced. See Exhibit WNS-1,

p.2. During the weekend of November 17, 2001, BellSouth implemented the

release that corrected the problem encountered earlier when an LSR for UNE-P

migration was submitted with a Telephone Number for which were one or more

non-working addresses associated with that telephone number.

7.   In implementing TN migration, BellSouth was confronted with two different

pending change requests, one submitted by WorldCom that would have involved

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validating the customer's name in order to ensure that the correct customer record is being processed, while the other was submitted by AT&T that involved validating the house number on the LSR. Based on an analysis of LSRs submitted by CLECs, BellSouth determined that implementing WorldCom's approach would actually cause reject rates to increase. Consequently, BellSouth recommended that AT&T's proposal to validate the house number be adopted, and the members of the CCP agreed.

8. Although World Com has complained that BellSouth's implementation of TN migration by telephone number and street address did not comply with the GPSC's October 19, 2001 Order, WorldCom voiced no such complaints during the CCP discussion. BellSouth implemented TN migration consistent with the desires of the CCP. This is clear from even a cursory review of the minutes of the CCP meeting conducted on November 12, 2001, which is attached as Exhibit WNS-2.

9. BellSouth has continually sought feedback from all of the CLECs making use of the TN migration process. On November 29, 2001, BellSouth's Change Control Manager ("CCM") sent an e-mail to all CLECs participating in the CCP asking whether there were any outstanding issues associated with TN migration that BellSouth needed to address. The CCM asked CLECs to identify any problems they had found with TN migration and to send e-mails describing them. Before that date, with the exception of WorldCom's inquiry as noted above, no CLEC had expressed any concerns about the operation of the TN migration capability. No CLEC other than WorldCom responded to the CCM e-mail.

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10. On December 10, 2001, a follow-up meeting was conducted by the CCP to discuss any outstanding issues associated with the implementation of TN migration. WorldCom questioned whether other CLECs had issues associated with the implementation of this functionality. None of the CLECs present at the December 10, 2001 CCP meeting expressed any problems. The minutes of the December 10, 2001 CCP meeting are attached as Exhibit WNS-5.

11. The TN versus Address transaction flow is as follows: if present and valid, the full address will be used to calculate a due date. If an address is not valid or not present on the request, the LSR is scanned for the presence of an account telephone number ("ATN"), existing account telephone number ("EATN") or line existing account telephone number ("LEATN"), which is then used to calculate the due date. If successful, the transaction will proceed. If a valid telephone number cannot be found, an auto-clarification will be sent back to the CLEC. If a valid telephone number matches the street number (known as the SANO field) the LSR will then proceed to SOCS for the processing of a service order and the return of a firm order confirmation.

12. When BellSouth released the TN migration functionality on November 3, 2001, BellSouth also performed a secondary check of the RSAG-validated address on the LSR against the CSR. However, because mismatches between the RSAG and CSR databases were causing orders to be rejected back to the CLECs, this check was removed from the sequence with Release 10.3.1 on February 2, 2002. While WorldCom has complained about this issue, the fact is that **** **** of WorldCom's orders were rejected due to BellSouth checking the address on the

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LSR against the CSR while it was in place. Now that this check is no longer in place, WorldCom should have no complaints whatsoever.

13. Between November 17 and November 19, 2001, MCI sent a total of **** **** LSRs for UNE-P conversion. At WorldCom's request, BellSouth performed an analysis of **** **** Purchase Order Numbers ("PONs"), that received "address type" error codes. BellSouth's analysis revealed that the release was and is working as designed, and that all of the clarifications returned on the **** **** PONs were valid. Attached as Exhibit WNS-3 is an e-mail that summarizes the results of the analysis sent to WorldCom on November 21,2001, and, the spreadsheet presenting that analysis, which accompanied the November 21, 2001 e-mail.

14. The analysis placed each of the PONs in one of four categories based on the error message WorldCom received for that PON, as shown in Exhibit WNS-4. **** **** PONs received the error message: TN FOR NON WORKING ADDRESS: DUE DATE COULD NOT BE CALCULATED. Of these **** ****PONs, **** **** were associated with telephone numbers that had already been ported to a CLEC and so RSAG correctly showed no working address for the TN. For **** **** of the PONs, an error in RSAG caused the error message.

15. Each of the **** **** PONS in the second category received the following error message: G9475 "Act= ALLOWED ONLY ON SAME LOCNUM SERVICE ADDRESS." For **** **** of these PONs, errors in CRIS caused the clarification, while RSAG caused **** **** PON clarification. For the **** **** PON in this category, WorldCom had entered an incorrect Account Telephone Number, or ATN.

16. The **** **** PONs in the third category received the error message: "G7250 "LSR HOUSENUMBER INCORRECT". Each of these PONs was returned to WorldCom for clarification because WorldCom had entered an incorrect house number.

17. The two PONs in the last category received the error message: G9871 "ADDRESS/TN INVALID, DUE DATE COULD NOT BE CALCULATED". Each of these PONs was returned to WorldCom because the PON did not contain a correct ATN.

18. As indicated above, BellSouth's review revealed a few incorrect records in RSAG, and the Customer Record Information System, or CRIS, that will require correction so that affected LSRs can flow through, as shown in Exhibit WNS-4. The number of PONs affected by these incorrect records, however, was very small, **** **** of the total WorldCom volume over the three-day period. BellSouth has recently discontinued the CRIS edit, which resolved many of the issues raised by WorldCom. However, inaccurate records in RSAG do and will continue to affect BellSouth's retail operations in the same way they affect WorldCom and other CLECs. BellSouth has a process in place to resolve database conflicts as communicated at the November 20, 2001, CCP meeting.

19. Although WorldCom raises a plethora of issues related to the TN migration, it is by no means the only CLEC that utilizes this functionality. Region-wide, from December 1, 2001 to January 31, 2002 there were over 325,000 UNE-P requests submitted utilizing the new functionality.[2] There were 12 CLECs that submitted over 2,000 orders each during this time region-wide. While WorldCom certainly

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has the largest volume of UNE-P orders, it is by no means the only CLEC using the

UNE-P to compete. There are numerous other sizeable CLECs utilizing this

functionality successfully and without complaint.

20. In summary, in the three months, that TN migration has been available to CLECs,

every indication is that this capability is functioning successfully. BellSouth is

unaware of any problems with this functionality, and BellSouth has proactively

requested their feedback. In fact, no CLEC other than WorldCom has indicated any

problem with TN migration, which is significant given the large volume of UNE-P

migration requests submitted since the functionality was deployed. Two sets of

facts clearly demonstrate the lack of issues. First, the overall reject rate for UNE-P

migration requests has dropped over 35% from October to January. Second, the

address related errors for these same requests have been reduced by over 60% in

this same time frame. Both mechanized rejects and address related errors have

declined significantly since the implementation of TN migration. This data, and

additional CLEC specific data are included as attachment WNS-6.

21. Attached as Exhibit WNS-7 are tables showing CLEC usage of TN migration of

UNE-P between November 17, 2001 and January 28, 2002.

22. On February 2, 2002 BellSouth expanded the CLECs' ability to order by telephone

numbering to include resale (non-complex plus ISDN-BRI, and PBX) and loops

(excluding xDSL). Before the release, BellSouth conducted internal user

acceptance testing (UAT) on this functionality and the test results were successful.

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[2] Includes all UNE-P excepts except "new" accounts (activity type N) and outside moves (activity type T).

III. Parsed CSRs

23. Parsed CSR functionality was released in the TAG pre-ordering interface for testing in the CAVE testing environment on December 8, 2001, as scheduled. On January 5, 2002, as scheduled, BellSouth released this functionality into production. BellSouth now offers the CSR in the parsed format, just as Bell Atlantic/Verizon did when it was approved for long distance in 1999. In fact, as shown below, BellSouth currently provides a more robust parsed CSR (i.e. more fields parsed) then Verizon currently does. CLECs, however, may still receive the unparsed stream of data, if they choose.

24. Two software vendors representing multiple CLECs, Telcordia Technologies and Exceleron, tested the parsed CSR capability in the CAVE test environment, and have verified that the capability functions as specified. Another vendor also successfully tested the parsed CSR functionality. This vendor's report is attached as Exhibit WNS-8.

25. BellSouth engaged Telcordia to test the integrated pre-ordering and ordering capabilities of TAG in the CAVE test environment. This included testing the parsed CSR query. Telcordia developed a "pseudo CLEC" test to show that a CLEC using TAG can submit a CSR query to BellSouth, and integrate the data from the parsed CSR with the ordering process. Attached as Exhibit WNS-9 is a report prepared by Telcordia that describes the successful integration of preordering and ordering functionality, including the parsing of the full CSR.

26. To develop its test system, Telcordia used only the publicly-available BellSouth documentation from BellSouth's web site and the change control process, and the

question and answer process that is part of BellSouth's CCP. Also, Telcordia's test system interfaced with BellSouth's integrated pre-order and order capabilities no differently than the systems of the CLECs and their suppliers/vendors. The test called for Telcordia to use its test system to test different types of requests in CAVE, including those for unbundled loops, resale, and UNE-P. The Req/Act type combinations tested by Telcordia account for over 79% of all activity received during a typical month (January, 2002), and for 99% of all UNE-P migration-as-specified order types.

27. Telcordia initiated multiple CSR queries to CAVE; CAVE accepted these queries and returned parsed CSRs. Of the test cases executed by Telcordia, the parsed CSR response consisted of approximately thirty (30) to forty (40) fields, even though each field may contain additional data detailing the particulars of a CSR record. The data returned on the parsed CSR response was accurately displayed on the Telcordia's interface. A subset of the parsed CSR data on the response was also successfully used to automatically pre-populate the appropriate fields on subsequent orders sent to the CAVE testing environment. Using the response data from the parsed CSR responses, Port-Loop Combo, Simple POTS Resale, and Loop Migration Orders were all successfully processed in CAVE and received valid FOCs and completions.

28. The test agreement and the test summary from the test with Exceleron are attached as Exhibits WNS-10 and WNS-11, which indicate, "Exceleron utilized BellSouth documentation and required no additional assistance with development of parsed CSR."

29.   When testing Parsed CSR, Telcordia and Exceleron and the other vendor noted possible minor deficiencies in documentation found when preparing to test. A review of the items noted by the vendors revealed that they were a result of a combination of reasons. One was due to a misunderstanding of the documentation by the vendor. The BellSouth technical support was able to work with them and correct that misunderstanding. Two other items concerned confusion from items in the system documentation. Those items are being reworded to ensure that they can be more easily understood. In its report appendix, Telcordia noted discrepancies with the TAG API Guide 7.7.0.1 and with the BBR. On February 5, 2002, BellSouth posted version 7.7.1.3 of the TAG API Guide which corrects the discrepancy regarding the Company Code. Telcordia also noted a discrepancy in the BBR-LO (version 9Q of September 28, 2001) related to the port type field. BellSouth posted a new version of the BBR-LO on November 9, 2001 (version 9R), which corrected this discrepancy.

30.   In addition to the testing by Exceleron and Telcordia, BellSouth and Birch Telecom recently tested the parsed CSR as part of Birch's test of its upgraded TAG interface. Production Verification Testing of Birch's Parsed CSR – Pre-Ordering Application was completed successfully on January 21, 2002, pursuant to the TAG Application Test Plan that was executed between BellSouth and Birch Telecom. Production Verification Testing is performed as a final step after all other testing phases have been completed. Attached as Exhibit WNS-13 is Birch's Staged Testcase Specifications for TAG CLEC Application Testing for 7701 Parsed CSR – Pre-Order. Birch's representative successfully pulled parsed CSRs for both residential and business accounts at that time. All test scenarios received "Pass" as a grade,

which indicates, per the terms of the contract, that "test cases ...have been executed and both the CLEC and BellSouth have agreed that the success criteria specified in the test plan ha[ve] been met." Attached as Exhibit WNS-13 is Birch's CSR Test Summary, which indicates that the testing was successful.

31. Attached as Exhibit WNS-14 is the document notifying the CLECs of the minor defects with the parsed CSR release. These documents were distributed by the CCP to all participants. These low impact defects are being addressed and Change Requests have been issued through the CCP. A low impact defect is defined under the CCP Plan as one that causes a CLEC inconvenience or annoyance. None of these defects has a significant impact on a CLEC's use of the parsing functionality. All release functions were successfully tested and performed as specified, except for these low impact defects. Uncovering minor defects is not unusual with any software release for any company. As of February 4, 2002, 16 of the 23 outstanding defects were corrected. There are still 7 minor outstanding defects, two related to directory listings and five related to directory delivery, which will be corrected in subsequent releases. These defects all have simple workarounds associated with them and should not have an impact on any CLEC actually desiring to use this capability. All 7 of these defects will be resolved in the March 24, 2002 release. Workarounds for the 7 defects have been published through the CCP.

32. Nevertheless, some CLECs are claiming that the minor defects identified in the release of parsed CSR are so serious that they cannot even begin testing the functionality. These claims are totally without merit. No software is completely defect free. Every company, including AT&T and WorldCom, places software into production with "minor" or low impact defects that, while inconvenient to the users of the software, allow the software to be used for all its major functions. These

defects are fixed as they identified in upgrades or replacement releases of the software.

33. Attached as Exhibit WNS-15 is a table describing each defect and providing an example of each. Exhibit WNS-16 includes a table of the defects with the workaround information for each defect. Two examples of the low impact defects that were identified in the parsed CSR software, and which demonstrate the de minimus nature of the defects, are as follows:

- DES field - capitalization problems on 2nd word. The DES (Designation field) identifies the professional designation phrase of the business listing. When the DES is two words, the first letter of the second word is being improperly capitalized. For example DES - rl Est is returned instead of DES = rl est.

- TL field contains part of LNFN field - When a single letter is identical to a title (i.e. V for fifth) is part of the listed name field, it is improperly returned as a title. For example, for the listed name "Michael V Smith" LNFN = Michael TL = V, LNLN = Smith is being returned instead of LNFN = Michael V, and LNLN = Smith.

34. Although these types of software errors are certainly inconvenient for the CLEC (and are being fixed as quickly as possible), they do not preclude the testing of BellSouth's parsed CSR functionality or prevent the actual commercial use of this functionality. The parsed CSR is primarily useful in those instances where a CLEC is converting an end user from BellSouth retail to either resale, or the UNE-P. In a large number of these conversions, the CLEC simply switches the end user "as-is" and this type of information from the CSR is not needed. If, however, the CLEC wished to change the directory listing at the time of the conversion, they would be

having a conversation directly with the end user about how he wished the new listing to appear. The existing listing information, even though parsed with an error, may be used as the starting point to develop the new listing information.

35. Although all of the defects associated with the implementation of Parsed CSR are considered to be low impact, in BellSouth's view there was only one defect that could be considered even slightly significant, and it was resolved the weekend of January 12, 2002. It involved a situation that would occur if a CLEC improperly used the address from the CSR to populate the service address section of an LSR. In the following limited circumstance, the order may have been rejected. In the CSR there are designations for thoroughfares, such as "st," "dr," or "hwy" ("street," "drive," or "highway"). If a customer's street name happened to match a thoroughfare indicator, and in addition there was no thoroughfare indicator after the street name (for example, 279 Hwy 280), then in this instance the parsed CSR information in the street name field would have been incorrectly left blank, while the street name thoroughfare would have been parsed as "Hwy 280".

36. BellSouth believes this issue would have arisen only on rare occasions, but in any event, the defect was corrected in a maintenance release on January 12, 2002. However, to the extent that a valid address is required on an order, the Business Rules do explain that CLECs should validate the address using RSAG before sending the LSR. As long as a CLEC had observed with the Business Rules requirement, this issue would not have been arisen. This issue should not have caused rejection of any UNE-P requests not only because the street name and

Public Disclosure Document

- The Preliminary Field Specifications document was provided to CLECs on October 12, 2001. This document contains field specific characteristics and was used by CLECs to assist in their preliminary coding efforts.

- An Exceptions and Clarifications document was provided to CLECs on October 12, 2001. This document provided information and clarification about fields that will not be returned as parsed data.

- The TAG API Guide was published on November 19, 2001 and posted on BellSouth's Interconnection web site. This document provides the detailed technical requirements that the CLECs use for coding their interfaces.

- The CSR Job Aid was updated on November 9, 2001 to include information on parsed CSRs such as what parts of the CSR would be parsed, how that data would be returned to CLECs, and examples. It was posted on the Interconnection web site on November 9, 2001. On December 13, 2001 the job aid was updated to include additional information on parsed CSRs and posted on BellSouth Interconnection web site.

- The Pre-Order Business Rules document was updated on December 13, 2001 to include information for requesting parsed CSRs. The information updated in this document is similar to information provided in the previous documents. It was posted on BellSouth's Interconnection web site on December 13, 2001.

40. CLECs will claim that there are a number of fields on the CSR that BellSouth "refuses to parse". As discussed previously, BellSouth successfully implemented the parsed CSR on January 5, 2002.

41. Originally, the CLECs requested that BellSouth parse and return one hundred and thirty-six (136) fields of information in LSOG 4 format. Subsequently, as a part of the change management process, BellSouth worked with the CLECs to develop a "CLEC Requested Requirements" document. This document, while not a commitment, served as a guide for the development of requirements by BellSouth. BellSouth has successfully parsed and returns eighty-seven (87) of the one hundred and six (106) fields requested by the CLECs. As stated previously in this affidavit, BellSouth provides more fields parsed than Verizon currently does. BellSouth parses and returns 87 fields; Verizon currently parses and returns 74 fields.

42. In questions submitted to BellSouth's Change Control on September 17, 2001, WorldCom disputed nineteen fields as being valid LSOG 4 format fields that BellSouth does not parse. BellSouth originally responded to WorldCom's questions on September 20, 2001. In the following discussion, we will address these nineteen disputed fields. WorldCom disputed one (1) field that is not a valid field in the LSOG 4 document and is not supported by BellSouth. The BellSouth CSR does not have a corresponding LSOG 4 format field for two (2) of the disputed fields. However, there are fourteen (14) fields of information that are valid on the BellSouth LSR which BellSouth has not parsed and which are identified as required, conditional or optional fields. Lastly, WorldCom disputed two (2) fields that are included in the validation transaction messages that BellSouth receives from the CLECs. Explanations for each of these "unparsed" fields is provided in the discussion following.

43. The BellSouth Business Rules for Local Ordering ("BBR-LO") identify the fields of information utilized on the BellSouth LSR as being required, conditional, or optional ("R/C/O").
    - *Required* means the field must be populated.

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- *Conditional* means the field is dependent upon the relationship to another entry as specified in the usage statement and is dependent upon the presence, absence, or combination of other data entries.

- *Optional* means the field may or may not be populated.

44. One (1) of the fields of information disputed by WorldCom, FEATDES – Feature Description, is not supported in the LSOG 4 document as a valid field. Furthermore, BellSouth does not support this field. The field is not found in the LSOG 4 document, in the BellSouth LSR or in the BellSouth CSR. This means there is no information contained in the CSR for parsing.

45. The following disputed fields are valid entries on the BellSouth LSR for some types of services. However, BellSouth is unable to provide the parsed information requested by the CLEC. These fields can be divided into two groups.

46. Group One – Even though the field is supported on the BellSouth LSR, there is no corresponding field in the BellSouth CSR. The field is not in the BellSouth CSR to be parsed.

Field Name	Field Description	LSOG4 Definition	R/C/O on BST LSR	Field Retained on BST CSR	Parsed
DDADLO	Delivery Address Descriptive Location	Identifies additional location information about the delivery address, (e.g. the trailer behind the gas station).	Conditional Optional	No	No

47. Group Two – There are fifteen (15) fields of information for which the related fields on the BellSouth CSR are not in LSOG 4 format, and, therefore, are not "parsed" into a LSOG 4 format field. "Parsed" format has been defined as "[E]ach separate piece of information is identified by a particular code that can be matched to a field on the CSR" Texas Order ¶ 152 n 412. Therefore, if the BellSouth CSR contains a

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piece(s) of information that cannot be matched to a field on the LSOG 4 pre-ordering field list, BellSouth has not "parsed" that field.

Field Name	Field Description	LSOG4 Definition	R/C/O on BST LSR	Field Retained on BST CSR	Parsed
TOS*	Type of Service	Identifies the type of service. The type of service identifies the end user account as business, residential, or government.	Required	No	No
NAME*	End User Name	Identifies the name of the end user. The name is not intended to be used for directory services.	Required	No	No
³NC	Network Channel Code	Identifies the network channel code for the circuits(s) involved. The network channel code describes the channel being requested.	Required	No	No
⁴NCI	Network Channel Interface Code	Identifies the electrical conditions on the circuit at the ACTL[Access Customer Terminal Location]/Primary Location.	Required	No	No
⁵SECNCI	Secondary Network Channel Interface Code	Identifies the electrical conditions on the circuit at the secondary ACTL or end user location.	Required	No	No
LST	Local Service Termination	Identifies the CLLI code of the end office switch from which service is being provided.	Required Optional (manual orders only for service types for which field is optional)	No	No
DGOUT*	DID Digits Out	Indicates the number of digits out pulsed from the central office to the customer's equipment.	Required Conditional (manual orders only both R/C)	No	No
⁶HNTYP*	Hunting Type Code	Identifies the type of hunting involved.	Required	No	No
⁷HTSEQ*	Hunting Sequence	Identifies the sequence of numbers in the hunt group.	Required	No	No
SGNL*	Signaling	Identifies the type of signaling	Optional or	No	No

[3] This field is not found on BellSouth accounts billed via CRIS. Accordingly, this information is not included in the CSR, since the record is generated from the information contained in the CRIS database.
[4] This field is not found on BellSouth accounts billed via CRIS. Accordingly, this information is not included in the CSR, since the record is generated from the information contained in the CRIS database.
[5] This field is not found on BellSouth accounts billed via CRIS. Accordingly, this information is not included in the CSR, since their record is generated from the information contained in the CRIS database.
[6] The valid data entries for this item on BellSouth's CSR vary widely based on the central office type being used to provide the service. As a result, there is no readily available methodology to parse this information in a consistent format. However, BellSouth is attempting to develop a method of translating the Hunting Type Code information. This enhancement is targeted for a Release during 2002.
[7] The valid data entries for the item on BellSouth's CSR vary widely based on the central office type being used to provide the service. As a result, there is no readily available methodology to parse this information in a consistent format. However, BellSouth is attempting to develop a method of translating the Hunting Sequence information. This enhancement is targeted for a Release during 2002.

			requested.	Required		
STYC*	Style Code	Identifies whether the listing is straight line, caption header, etc.	Required	No	No	
TOA*	Type of Account	Identifies the type of account for this listing.	Required	No	No	
LNPL*	Listing Name Placement	Identifies the placement of the listing based on the LNLN field.	Conditional	No	No	
LTXNUM*	Line of Text Reference Number	Identifies each line of information with a unique number.	Conditional	No	No	
BRO*	Business/Residence Placement Override	Identifies an override of the normal placement of business or residence listings.	Conditional Optional	No	No	

* The relevant information for these fields may be obtained from the parsed and/or unparsed fields contained on the CSR.

48. WorldCom also disputed two (2) fields that are included in the validation transaction messages that BellSouth receives from the CLEC. But, BellSouth does not transmit a response back to the CLEC for these fields. Therefore, the CLEC would never receive a reject for these fields.

Field Name	Field Description	LSOG4 Definition	R/C/O on BST LSR	Field Retained on BST CSR	Parsed
CC	Company Code	Identifies the Exchange Carrier generating the inquiry.	Required	No	No
AGAUTH	Agency Authorization Status	Indicates that the customer is acting as an end user's agent and has authorization on file.	Optional (manual orders only)	No	No

49. The lack of a parsed CSR in the past would not have prevented any CLEC from submitting an LSR to BellSouth. With parsed CSR implementation, the CLECs can obtain the information necessary to populate the appropriate fields on the BellSouth LSR from the parsed and/or unparsed entries in various Sections of the CSR, as well as from BellSouth's business rules for pre-ordering and BellSouth's business rules for submitting electronic and manual LSRs. The absence of parsed field(s) on the CSR does not preclude any CLEC from continuing to submit electronic and manual LSRs to BellSouth.

50. During a discussion of the parsed CSR in the CCP meeting of December 10, 2001, BellSouth questioned the CLECs as to how long they would need before they could

begin testing. CLECs stated that they needed time to digest the business rules and then would notify BellSouth when they were ready to begin testing. BellSouth agreed, that when ready, BellSouth would allow CLECs to test. The meeting minutes are attached as Exhibit WNS-17. On December 21, 2001, the CCP sent a memo to the CLECs announcing the extension of the window to test parsed CSRs, stating that, "[t]he CAVE test window for PCSR [parsed CSR] will be extended as appropriate to accommodate individual CLEC needs." CLECs were instructed to contact their account teams to schedule testing. The memo also included a list to remind the CLECs of the documents provided by BellSouth to establish this parsing. The memo is attached as Exhibit WNS-18. On January 9, 2002, BellSouth issued carrier notification letter SN91082804, which reiterated the memo of December 21, 2002. The carrier notification letter is attached as Exhibit WNS-19.

51. BellSouth has demonstrated that its OSS meets the tests for integration specified in previous Commission orders, and thus allows a CLEC a meaningful opportunity to compete.

IV. LINE LOSS REPORTING

52. In its request the Commission asked for detailed information concerning line loss reports BellSouth provides to CLECs. Most of the complaints about line loss records have come from WorldCom. Thus, BellSouth response will be focused on the line loss records that have been provided to WorldCom.

53. BellSouth provides notice to CLECs that they have lost a customer in multiple ways. BellSouth publishes a report on the web that allows CLECs to get all information on line losses. The issue with WorldCom has never been whether they have access to all of their line loss information. They have always had the option to

obtain this information from the web report. BellSouth also provides line loss

records electronically via Connect:Direct. WorldCom's previous complaints about

Line Loss notification have been that the records received via Connect:Direct (C:D)

(previously known as Network Data Mover – NDM) do not match the records on

the Line Loss report located on the BellSouth web site.[8] Connect:Direct is a

dedicated circuit for file transfer between BellSouth and WorldCom's data centers.

The reason these reports do not match is simple.

54.   When WorldCom made its initial request for receipt of line loss records via

Connect:Direct, it did not request all disconnect reasons to be included in their

Connect:Direct report. For example, WorldCom did not request that BellSouth

include Disconnection Reasons of "Switched in Error" (SE) in the C:D report. SE

is an indication that a customer's local service was switched by mistake or switched

without authorization from the end user. WorldCom has erroneously represented

that the reason the C:D report does not contain all Disconnect Reasons is a

BellSouth error. This is false. However, BellSouth wrote User Requirements for

the C:D Report based on WorldCom's unique specifications. Because WorldCom

did not request that all records be included, there was a difference in the C:D Report

and the Line Loss Report posted to the BellSouth web site at:

https://clec.bellsouth.com

55.   In mid-November 2001, Ms. Lichtenberg of WorldCom requested that the SE

records be added to the WorldCom C:D Line Loss Report. BellSouth implemented

WorldCom's request to add all other disconnect reasons to the C:D report as part of

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[8] https://clec.bellsouth.com

ENCORE Release 10.3.1 on February 2, 2002. WorldCom has always had the option of preventing any double billing issues by simply using the web report.

56. When WorldCom raised the issue of missing line loss notifications, BellSouth also furnished WorldCom with recovery data for the period October 1, 2001 through December 1, 2001, in a special transmission on December 5, 2001. Because WorldCom refuses to utilize the information provided on the web report, BellSouth also agreed to provide weekly transmissions of all loss data to WorldCom to assure that they receive all records, which has been done. WorldCom has requested recovery data from May 2001 through September 2001, and BellSouth has agreed to provide this information to WorldCom on or prior to May 7.

57. This concludes my affidavit.

435232

I hereby swear that the foregoing is true and correct to the best of my information and belief.

William N. Stacy

William N. Stacy

Network Vice President – Interconnection Services

BellSouth Telecommunications, Inc.

Subscribed and sworn to before me this 25th

Day of February , 2002.

Vicki L. Wright

Notary Public